

CUAUHTEMOC ORTEGA (Bar No. 257443)
Federal Public Defender
JELANI J. LINDSEY (Bar No. 280092)
Deputy Federal Public Defender
(E-Mail: Jelani_Lindsey@fd.org)
321 E. 2nd Street
Los Angeles, California 90012-4202
Telephone: (213) 894-2854
Facsimile: (213) 894-0081

Attorneys for Defendant
HANNAH WHITLOCK

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HANNAH WHITLOCK,

Defendant.

Case No. CR 24-00009-MEMF

**UNOPPOSED *EX PARTE*
APPLICATION FOR AN ORDER
MODIFYING BOND CONDITIONS,
CONTINUING THE POST-
INDICTMENT ARRAIGNMENT
HEARING, AND EXTENDING
TIME FOR BOND SATISFACTION**

Defendant Hannah Whitlock, through her counsel of record, Deputy Federal Public Defender Jelani J. Lindsey, hereby moves *ex parte* for an order modifying her bond conditions to allow for her to reside in the Western District of Washington, continuing her Post-Indictment Arraignment hearing to January 29, 2024, and extending the time for bond satisfaction.

//

//

//

//

//

//

//

1 The reasons for this *ex parte* application are set forth with particularity in the
2 attached declaration.

3
4 Respectfully submitted,
5 CUAUHTEMOC ORTEGA
6 Federal Public Defender

7 DATED: January 10, 2024

By: /s/ Jelani J. Lindsey
8 JELANI J. LINDSEY
9 Deputy Federal Public Defender
HANNAH WHITLOCK

DECLARATION OF JELANI J. LINDSEY

I, JELANI J. LINDSEY declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am licensed to practice law in the State of California, and I am admitted to practice in this Court. I was appointed to represent Ms. Whitlock in this matter on December 18, 2023, during Ms. Whitlock's initial appearance proceedings.

2. On December 18, 2023, the Court granted Ms. Whitlock's request for bail on multiple conditions. The Court allowed Ms. Whitlock to sign her own \$50,000 appearance bond to be replaced within 30 days by one or more unsecured bonds totaling \$50,000 signed by a responsible third party or parties. Dkt. 4 at 2. Furthermore, the Court restricted Ms. Whitlock's travel to the Central District of California and the Western District of Washington, which allowed her to travel to the Vancouver, Washington area for the holidays. *Id.* The Court also set January 12, 2024, as the date for Ms. Whitlock's Post-Indictment Arraignment hearing. *Id.* at 1.

3. At the time of Ms. Whitlock's initial appearance, she planned on residing with her partner in Los Angeles, California. However, Ms. Whitlock and her partner recently broke up, and she has no place to stay within the Central District of California. Additionally, Ms. Whitlock does not have the financial means to travel from the Western District of Washington to the Central District of for her PIA hearing on January 12, 2024.

4. For the reasons above, defense counsel requests a modification of Ms. Whitlock's bond conditions to allow her to reside in the Western District of Washington during the pendency of her case. Defense counsel also requests a continuance of Ms. Whitlock's PIA hearing to January 29, 2024, to allow her more time to gather money to travel to the Central District of California. Lastly, defense counsel requests an extension of the time to satisfy the bond conditions to January 29, 2024, in order to have more time to identify a third party or third parties that will be

1 willing to sign a \$50,000 unsecured bond on Ms. Whitlock's behalf or multiple
2 unsecured bonds on her behalf totaling \$50,000.

3 5. I emailed Assistant United States Attorney (AUSA) Sarah S. Lee on
4 January 9, 2024, concerning the filing of this *ex parte* application. AUSA Lee informed
5 me on January 10, 2024, that the government does not oppose this request.

6 I declare under penalty of perjury under the laws of the United States of America
7 that the foregoing is true and correct to the best of my knowledge.

8 Executed on January 10, 2024, at Los Angeles, California.

9
10 /s/ Jelani J. Lindsey
11 JELANI J. LINDSEY
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28